

# **EXHIBIT 2**

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

5 WAYMO, LLC, )  
6 Plaintiffs, )  
7 - vs - ) Case No.  
8 UBER TECHNOLOGIES, INC., ) 3:17-cv-00939  
9 OTTOMOTTO LLC; OTTO )  
10 TRUCKING, LLC, )  
11 Defendants. )

15                   VIDEOTAPED DEPOSITION OF JOHN BARES,  
16                   a witness, called by the Plaintiff for examination,  
17                   in accordance with the Federal Rules of Civil  
18                   Procedure, taken by and before Tammie Elias, RPR and  
19                   Notary Public in and for the Commonwealth of  
20                   Pennsylvania, at the office of Reed Smith, 225 Fifth  
21                   Avenue, Suite 1200, Pittsburgh, Pennsylvania, on  
22                   Friday, June 16, 2017, commencing at 9:05 a.m.

24      JOB No. 2640097  
25      PAGES 1 - 317

1	I read that correctly?	03:12p
2	A. Yes.	03:12p
3	Q. I'd like to ask you some questions about this	03:12p
4	bullet here. So when you wrote that he would	03:12p
5	bring filtered advice about what to try and	03:12p
6	not try, what does that refer to?	03:12p
7	A. Filtered advice to me was know-how. It's like	03:12p
8	which way to attack the mountain and he had	03:12p
9	been at this since I met him that day in the	03:12p
10	desert in 2004, multiple companies, multiple	03:12p
11	efforts. The first guy to send an autonomous	03:12p
12	car across the Bay Bridge, he knew a lot about	03:12p
13	autonomy, so he would bring filtered men, he's	03:12p
14	not going to bring direct advice from a prior	03:12p
15	company such as Google, but he would bring	03:12p
16	filtered to me, like you filtered up enough	03:12p
17	and then it's know-how.	03:12p
18	Q. So the second part here you write that is █	03:12p
19	███████████	03:12p
20	███████████	03:12p
21	████████   What does that refer to?	03:13p
22	A. ██████████	03:13p
23	████████████████	03:13p
24	████████████████	03:13p
25	████████████████	03:13p

1	[REDACTED]	03:13p
2	Q. So then the next bullet says worked for	03:13p
3	Velodyne for a spell, not sure about that	03:13p
4	except that he knows their IP. Did I read	03:13p
5	that correctly?	03:13p
6	A. Uh-huh.	03:13p
7	Q. What does that refer to?	03:13p
8	A. Just what it says, he worked for Velodyne I	03:13p
9	believe around 2005 he was a consultant or an	03:13p
10	employee, he sold sensors for them. And I	03:13p
11	didn't know much about his relationship with	03:13p
12	them, but he would certainly have known their	03:13p
13	IP given that he worked for them or was a	03:13p
14	consultant for them.	03:13p
15	Q. The next section here says warnings. The	03:13p
16	first one I think we talked about this	03:13p
17	earlier, heard bad things from Salesky, do you	03:14p
18	see that?	03:14p
19	A. Uh-huh.	03:14p
20	Q. So when you were talking earlier about what	03:14p
21	Mr. Salesky told you, you were mostly focusing	03:14p
22	on a conversation, an hour long conversation	03:14p
23	he had with you in either late January or	03:14p
24	early February; is that correct?	03:14p
25	A. Correct.	03:14p